

Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

Janice L. Ta (admitted *pro hac vice*)
JTa@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street Suite 1700
Austin, Texas 78701
Telephone: +1.737.256.6100
Facsimile: +1.737.256.6300

Jassiem N. Moore, (admitted *pro hac vice*)
JassiemMoore@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336
BKadjo@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant NETFLIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**[PROPOSED] STIPULATION AMENDING
PROTECTIVE ORDER**

WHEREAS, by stipulation of the parties, a protective order issued in this action on July 25, 2022 (the “Protective Order”);

NOW, THEREFORE, Plaintiff and Defendant hereby agree and stipulate to the amendment of the Protective Order issued in this action on July 25, 2022, as follows:

The following documents are designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY,” however for the purpose of transparency under Rule 408, Valjakka allows Netflix In-House Counsel to view these documents:

LV003942;

LV004030;

LV004038;

LV004058;

LV004070;

LV2_000410;

LV2_000799;

LV2_002242

LV2_002712;

LV2_003057;

LV2_003282;

LV2_003450;

LV2_004315;

NFX-VALJ-00011043;

NFX-VALJ-00011048.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED July 27, 2023

/s/ William P. Ramey, III.

William P. Ramey, III (appearance *pro hac vice*)

wramey@rameyfirm.com

RAMEY LLP

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone: +1.713.426.3923

United States District Court
Northern District of California

Facsimile: +1.832.689.9175

Susan S.Q. Kalra, Bar No. 167940
susan@m-iplaw.com
RAMEY LLP
303 Twin Dolphin Drive, Suite 600
Redwood City, California 94065
Telephone: +1.408.236.6640
Facsimile: +1.408.236.6641

Attorneys for Plaintiff LAURI VALJAKKA

DATED: July 27, 2023

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

Janice L. Ta (appearance *pro hac vice*)
JTa@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street, Suite 1700
Austin, Texas 78701
Telephone: +1.737.256.6100
Facsimile: +1.737.256.6300

Jassiem N. Moore, (appearance *pro hac vice*)
JassiemMoore@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336
BKadjo@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant NETFLIX, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. Jon S. Tigar
United States District Judge

United States District Court
Northern District of California

SIGNATURE ATTESTATION

I, Sarah E. Piepmeier, am the ECF user whose user id and password authorizes the filing of this documents. Under Civil L.R. 5-1(h)(3), I attest that counsel for Plaintiff has concurred in this filing.

Dated: July 27, 2023

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier, CA SBN 227094

Attorney for Defendant Netflix, Inc.